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IDAHO PUBLIC  
UTILITIES COMMISSION

Attorney for the Idaho Conservation League

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE	)	
APPLICATION OF IDAHO POWER	)	CASE NO. IPC-E-16-02
COMPANY TO IMPLEMENT FIXED	)	
COST ADJUSTMENT ("FCA") RATES	)	THE IDAHO CONSERVATION
FOR ELECTRIC SERVICE FROM JUNE	)	LEAGUE
1, 2016, THROUGH MAY 31, 2017.	)	PETITION TO INTERVENE

The Idaho Conservation League ("ICL") petitions the Commission to intervene in this matter pursuant to the Idaho Public Utilities Commission Rules of Procedure, IDAPA 31.01.01.071-073. As discussed below, ICL has direct and substantial interests in these proceedings, and therefore should be granted intervention.

1. The name of this intervenor is:

Benjamin J. Otto  
Idaho Conservation League  
710 N. 6<sup>th</sup> st.  
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In the interest of conserving natural resources and reducing the costs, please provide hard copies of pleadings, testimony, and briefs only to the name and address above. Production requests, responses, notices, Commission orders, and other filings may be submitted via electronic mail in accordance with IDAPA 31.01.01.063.02-03.

2. The Idaho Conservation League claims a direct and substantial interest in this proceeding. As Idaho's largest state-based conservation organization, we have over 25,000 supporters, most of who are residential customers of Idaho Power. ICL also has an interest as a small commercial customer of Idaho Power taking service under Schedule 7. ICL and our supporters have a substantial interest in maintaining a robust energy conservation program to avoid burning fossil fuels and the need for additional energy infrastructure both of which meet

our supporters' desire to protect Idaho's air quality and natural landscapes. The Fixed Cost Adjustment is an important mechanism to support utility sponsored energy conservation programs and we have a direct and substantial interest in reviewing Idaho Power's proposed rates. ICL's intervention will not unduly broaden the issues in this proceeding.

3. ICL intends to fully participate in this matter as a party. The nature and quality of ICL's intervention in the proceeding is dependant upon the nature and effect of other evidence in this proceeding. ICL may seek intervenor funding pursuant to IDAPA 31.01.01.161-165.

WHEREFORE, ICL respectfully requests the Commission grant this petition.

DATED this 6th day of April 2016.

Respectfully submitted,



Benjamin J. Otto  
Idaho Conservation League

#### CERTIFICATE OF SERVICE

I hereby certify that on this 6th day of April 2016, I delivered true and correct copies of the foregoing PETITION TO INTERVENE to the following persons via the method of service noted:

Hand delivery:

Jean Jewell  
Commission Secretary  
Idaho Public Utilities Commission  
427 W. Washington St.  
Boise, ID 83702-5983  
(Original and seven copies provided)

Electronic Mail:

Lisa D. Nordstrom  
Zachary L. Harris  
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Benjamin J. Otto